

ALLEN & OVERY LLP

Ken Coleman
Daniel J. Guyder
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 610-6300
Facsimile: (212) 610-6399

Attorneys for the HSBC Parties

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS INC., *et al.* :
: Case No. 08-13555 (SCC)
Debtors. :
: (Jointly Administered)
-----X

**RENEWED JOINDER OF THE HSBC PARTIES TO THE OBJECTION OF CITADEL
ENERGY INVESTMENTS LTD AND CITADEL EQUITY FUND LTD TO THE
MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES
PURUSANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

HSBC Bank USA, National Association, HSBC Bank plc, HSBC France, and the Hongkong and Shanghai Banking Corporation Limited (collectively, the “**HSBC Parties**”) hereby submit this renewed joinder¹ to the objection of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. [Dkt. No. 49030] (the “**Citadel Objection**”)² to the *Motion to Allow Disclosure of Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* [Dkt. No. 48939] (the “**Original Motion**”) and to the *Motion to Renew Motion to Allow Disclosure of Derivatives Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* [Dkt. No. 51312] (the “**Renewed Motion**” and with the Original Motion, the “**Motions**”) of the above captioned debtors (the “**Debtors**”) and join all other objections to the Motions to the

¹ The HSBC Parties originally joined the Citadel Objection on April 1, 2015 [Dkt. No. 49131].

² Capitalized terms used but not defined herein have the meanings assigned to them in the Citadel Objection.

extent not inconsistent with the Citadel Objection, as such applies to the HSBC Parties, including for the avoidance of doubt any objections filed by the Citadel Entities to the Renewed Motion.

In support of this joinder, the HSBC Parties respectfully state as follows:

OBJECTION AND JOINDER

1. Each of the HSBC Parties is a party to certain derivatives contracts with one or more of the Debtors.
2. The HSBC Parties hereby renew their joinder and assert by reference the objections and arguments, in their entirety, made by the Citadel Entities in the Citadel Objection to the Motions as such apply to the HSBC Parties and their contracts with the Debtors.³

WHEREFORE, for the foregoing reasons, the HSBC Parties respectfully request that this Court deny the Motions, and, alternatively, if the Court grants the Motions, that this Court direct the Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York
November 6, 2015

ALLEN & OVERY LLP

By: /s/ Daniel J. Guyder
Ken Coleman
Daniel J. Guyder
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 610-6300
Facsimile: (212) 610-6399
ken.coleman@allenoverly.com
daniel.guyder@allenoverly.com

Attorneys for the HSBC Parties

³ The HSBC Parties reserve all rights to seek discovery from the Debtors in respect of any pending claim resolution disputes and proceedings to the extent the Motions purport or seek to adversely affect such rights.